



"Your Global Connection"

# NORTH DAKOTA LONG DISTANCE

PO BOX 857 • DEVILS LAKE, ND 58301-0857 • (701) 662-7350 • 1-800-597-6353 • FAX (701) 662-7955  
Visit us at our web site: [www.ndld.com](http://www.ndld.com)

July 9 2004

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JUL 23 2004

FCC - MAILROOM

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20544

Re: In the Matter of The Pay Telephone Reclassification and Compensation  
Provisions of the Telecommunications Act of 1996, CC Docket 96-128

Dear Ms. Dortch:

North Dakota Long Distance ("NDLD") submits this letter and accompanying certification as record that NDLD is not a "Completing Carrier" as that term is defined in the Commission's Order in CC Docket 96-128 ("Order")<sup>1</sup>, released on October 3, 2003.

As NDLD is not a Completing Carrier nor does it handle the types of calls the Commission has specified as being subject to both compensation and reporting to Payphone Service Providers, NDLD is not subject to such requirements at this time. If NDLD's operations are altered to the extent that NDLD necessarily becomes a Completing Carrier, NDLD will fully comply with the Commission's rules pertaining to this and all other payphone compensation and reporting matters.

Sincerely,

Juli Schafer-DeVier  
General Manager  
North Dakota Long Distance

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<sup>1</sup> *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996, CC Docket No. 96-128, Report and Order, (2003) (Order).*

## LOCALLY OWNED BY

Reservation Telephone Co-op, Parshall, ND 1-888-862-3115	Dakota Central Co-op, Carrington, ND 1-800-771-0974	Polar Communications, Park River, ND 1-800-284-7222
United Telephone, Langdon, ND 1-800-844-9708	North Dakota Telephone Company, Devils Lake, ND 1-800-880-4213	Midstate Telephone, Stanley, ND 1-800-523-5436
Dickey Rural Networks, Ellendale, ND 1-877-559-4692	BEK Communications Co-op, Steele, ND 1-888-475-2361	Northwest Communications, Ray, ND 1-800-245-5884
MLGC, Enderlin/Cooperstown, ND 701-437-3300 or 701-797-3301		



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## PAY TELEPHONE COMPLETING CARRIER CERTIFICATION OF NORTH DAKOTA LONG DISTANCE

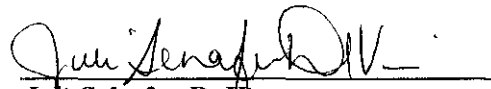
1. My name is Juli Schafer-DeVier. I currently serve as the general manager of North Dakota Long Distance (NDLD), a provider of interstate interexchange telecommunications services as a toll reseller in the state of North Dakota. In this capacity, I have become familiar with the network operations of NDLD and its practices associated with the completion of calls originated from Pay Telephones.
2. NDLD is not a Completing Carrier as defined by Commission in 47 CFR § 64.1300.
3. With respect to coinless or access code calls, NDLD is a switchless reseller. NDLD contracts with MCI and Global Crossings for completion of calls originated by access code.
4. With respect to subscriber toll-free payphone calls, NDLD is a switchless reseller. NDLD contracts with MCI for completion subscriber toll-free calls.
5. NDLD does not perform call validation or processing functions for either access code calls or subscriber toll-free payphone calls.
6. NDLD's does not create call detail records for either access code calls or subscriber toll-free payphone calls. NDLD's action with respect to call detail records is limited to rating and billing.
7. NDLD compensates MCI and/or Global Crossings for the wholesale cost of subscriber toll-free or access code calls.
8. NDLD has confirmed with MCI and Global Crossings that any calls purchased by NDLD are included in the respective call tracking systems and compensation remittance process of MCI and Global Crossings.
9. In consideration of the aforementioned facts, NDLD is not subject to the compensation or reporting requirements related to the Commission's Report and Order<sup>1</sup> and associated revisions to 47 CFR Sections 64.1300, 64.1310, and 64.1320.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on 07/09/04

<sup>1</sup> *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996, CC Docket No. 96-128, Report and Order, (2003) (Order).*

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*Juli Schafer-DeVier*

*General Manager*

*North Dakota Long Distance*

*PO Box 857*

*Devils Lake, ND 58301*

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